

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

DEBRA BLAKE,

Defendant.

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No. 4:21 CR 715 HEA

**DEFENDANT'S SENTENCING MEMORANDUM**

Ms. Blake is requesting a sentence of 10 months as the punishment for her involvement in this case of Possession of Five or More Identification Documents and Interstate Transportation of a Stolen Vehicle. Ms. Blake recommends this sentence after careful consideration of all the sentencing factors before the Court. The history and characteristics of Ms. Blake support this recommendation. Specifically, she points to Paragraph 99 of the Pre-sentence Report which state that there are several 18 U.S.C. Section 3553(a) factors that apply to her and support a downward variance from the 18month to 24-month Guideline Sentence. Debra is 36 years old, and she is facing her first significant term of incarceration. She suffers from mental health illness and has a significant substance abuse addiction issue. Debra is also pregnant and is due to have her child in late December of this year.

Debra was a minor participant in the criminal activities she has plead guilty to. Debra's co-defendant manipulated her into agreeing to participate. Men manipulating and trying to control Debra has been a negative influence through-out her entire life. Debra's father was strict and sever, he threw her out of her house at age 17. Debra has had numerous relationships since, husbands and boyfriend forcing her to do what they tell her. She has also experienced domestic abuse at the hands of these men.

Adding to Debra's poor decision making has been her addition to Methamphetamines and her diagnosed mental illness. The PSR describes Debra's issues with drug addiction in paragraphs 62-64. Her addiction caused her to violate her pre-trial release. The PSR suggests Debra may benefit from placement in the Residential Drug Abuse Program (RDAP) while incarcerated. We are asking that Debra be ordered to participate in drug counseling and testing as part of Supervised Release.

Debra realizes the gravity of her conduct. She knows she will be punished for her involvement in this matter. However, she can see beyond her immediate future and has plans to continue her work in fast food. She has a loving and supportive family and friends who want to see her succeed and will offer her the support she will need to redirect the path of her life. She has a grandchild and a baby on the way. She has much to change her life for. Debra has had a very traumatic experience which has added to her mental health issues. She was repeatedly stabbed by three men. She has been treated for self-mutilation in Baptist Floyd Health Center in Indiana. In 2022 she was diagnosed with depression, PTSD, panic attacks and night terrors. She recognizes that while on Supervised Release she needs to participate in mental health counseling and continue to take medication to help treat these issues.

### **CONCLUSION**

Ms. Blake asks this court to sentence her to the recommendation of 10 months which is below the low end of the Guidelines Range of 18-24 months. The PSI does state that the Court may wish to consider whether a downward variance may be appropriate in this case, considering the factors outlined in 18 U.S.C.3553(a). A variance from the prescribed guideline range is warranted in this case based upon the history and characteristics of the defendant. The Defendant had a difficult life as stated above.

A sentence of 10 months would be appropriate to allow her to be a productive member of the community taking care of her family. For these reasons, Ms. Blake asks that this Court follow the recommendation of 10 months with drug testing, drug treatment and mental health treatment while on supervised release. Such a sentence will provide just punishment, protect the public, provide adequate deterrence, and promote respect for the law.

Respectfully submitted,

/s/ Eric Selig  
Eric Selig #40673 MO  
Assistant Federal Public Defender  
1010 Market Street, Suite 200  
St. Louis, Missouri 63101  
Telephone: (314) 241-1255  
Fax: (314) 421-3177  
E-mail: Eric\_Selig@fd.org

ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2023, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon John J. Ware, Assistant United States Attorney.

/s/ Eric Selig  
ERIC SELIG 40673MO  
Assistant Federal Public Defender

